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MEMORANDUM

TO: Dave Wineman, EPA Region VI RPO

FROM: K. H. Malone, Jr., FTTOM

THRU: Tim A. Hall, AFITTOM

FROM: James Hussey, FTT Geologist

DATE: August 26, 1988

SUBJ: PA Reassessment for Nalco Chemical Co., Odessa, TX
TDD #F-06-8804-34
CERCLIS #TXD095217766
PAN #FTX 0067PAA

The Nalco Chemical Company is an oilfield chemical warehouse and transport facility located on a 15.5 acre tract in Odessa, TX. Products stored and transported at the site are corrosion and scale inhibitors, oil/water emulsion breakers, biocides, and various water treatment chemicals. No manufacturing or blending of chemicals or products occurs at the facility. Structures present on the site include a warehouse, an office building, 30 bulk storage tanks, and a below-grade surface impoundment used as a pollution control pond. This site has been in operation since 1976.

The main area of concern has been the pollution control pond. The dimensions of this pond are approximately 75 ft. x 80 ft. x 8 ft. The site operators kept a two-foot freeboard on this pond to prevent overflow. This gave a normal operating volume of 102,000 gallons, although the maximum amount of water ever held in the pond is reported to be 157,000 gallons. The pond has a seamless Gunnite lining installed to prevent leakage. This lining is reported to be of good integrity (see ROC 1). From 1976 to 1985 the pond was used as a catch basin for wash water from the truck loading/unloading area located on the edge of the pond, and the tank farm and drum storage area. These areas are curbed and drain into a concrete-lined trench, which empties into an oil separator and finally into the pond. The only waste reported to be produced on the site is a floating oily sludge that is collected in the oil separator and disposed off-site. The wash water is temporarily stored in the pond and eventually used as flush water in oil wells.

On January 26, 1984, the Texas Water Commission (TWC) obtained liquid samples from the pond. The analysis showed a mixture of approximately 50% alkyl benzenes, with alkyl naphthalenes, substituted indenes, indanes, biphenyls, and a trace of aliphatic hydrocarbons (see Attachment A). No contamination by

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these substances of groundwater is suspected, although no groundwater samples have been taken to confirm this.

On November 8, 1985, an agreement was reached between Nalco and the EPA that allowed Nalco to change the procedure in which they would utilize the collection pond (see Attachments B and C). All substances in the pond were removed and disposed according to EPA requirements. The Gunnite liner was inspected, found to be in sound condition, and cleaned with pressurized steam. A concrete pad was constructed in the bottom of the impoundment and two steel storage tanks were installed atop the pad for collection of liquids (see Attachments D, E, and F). The Gunnite liner will be used as a secondary containment structure.

In 1985, soil samples from near the collection pond were taken by the TWC. If analyses showed contamination the site owners were to install monitor wells at various points on-site. However these samples contained no contamination (see ROC 1. Sample results are not available to the FIT at this time).

Previous FIT activity at the site consists of a Preliminary Assessment performed by EPA Region VI FIT personnel in April 1981. A recommendation for no further action was issued at that time. EPA personnel have been involved with Nalco in order to oversee proper disposal of the pond contents.

Drinking water for this area is obtained from wells drilled into the Antlers Sand of the Edwards/Trinity Aquifer. This sand unit is initially found at 50 to 75 feet below the ground surface. There is no documented use of surface water in the area, as only several small playa lakes are found in the vicinity. A very low precipitation amount and high evaporation rate cause an arid climate in the region. There is no documentation of hazardous materials in the groundwater or air. This site will not achieve a sufficient score for inclusion on the NPL. The FIT therefore recommends no further action at this time.